

Challenge Commitment Policy for the National Environmental Performance Track Program

Challenge Commitment Policy Summary

When a first-time or renewing Performance Track applicant makes a future performance “challenge commitment” that addresses a regional or national environmental priority, that single challenge commitment may be counted as two performance commitments. The applicant then only has to make three future commitments rather than the standard four, so long as one of the commitments addresses the regional or national priority.

Background

All new and renewing applicants to the National Environmental Performance Track Program (Performance Track) must make four (or in the case of small facilities, two) future performance commitments. Applicants may select commitments associated with indicators from several different categories, including energy use, water use, materials use, air emissions, waste, preservation/restoration, discharges to water, product performance, and suppliers’ performance. Performance Track strongly encourages applying facilities to closely align their commitments with their significant aspects and related objectives and targets as identified in their Environmental Management Systems (EMSs).

In an attempt to challenge members to respond to local, regional, or national environmental priorities, Performance Track is instituting a policy whereby applicants can receive “credit” for addressing a regional or national environmental priority through their commitments. The *Challenge Commitment Policy* addresses this goal.

Policy Details

Facilities may receive the “2-for-1” credit for either a regional or national challenge commitment. This section applies to both regional and national challenge commitments.

- Challenge commitments shall be communicated to applicants in advance of the program application or renewal period, allowing enough time so that facilities can reasonably respond with a relevant project. Challenge commitments shall be posted on the Performance Track website.
- The facility shall commit to the challenge commitment for a period of three years (i.e., until the next renewal period).
- Facilities can take advantage of only one challenge commitment allowance. If there is more than one challenge commitment available, the facility can choose multiple commitments, but would **only receive credit for one** challenge commitment; i.e., facilities participating in the challenge commitment program will make **no fewer than three commitments**.

- Small facilities (defined by Performance Track as any facility with fewer than 50 full-time employees) may select a challenge commitment, but they are not permitted to count that single challenge commitment as two future performance commitments. Performance Track already accommodates small facilities by reducing the number of future commitments from four to two. Allowing small facilities to take advantage of the challenge commitment replacement policy would result in a small facility having only one commitment. One commitment is not consistent with the status of Performance Track members as leaders and does not reflect the program's commitment to multimedia environmental protection.

Regional Challenge Commitments

- Each EPA Regional office, in consultation with their respective state(s), may establish challenge commitments for its region. In setting a challenge commitment, the Region must ensure that it addresses a regional environmental priority as established by a governing authority. Governing authorities include local governments/regulatory authorities (e.g., state air control boards), state governments, EPA regional offices, and EPA headquarters (HQ).
- When designating a challenge commitment, the Region must:
 - ensure that the challenge commitment specify a minimum quantitative target (HQ can provide additional guidance in setting numerical targets).
 - memorialize the challenge commitment in a memorandum to the Director of the National Environmental Performance Track program from the Region's Deputy Regional Administrator.
- Facilities may only take advantage of a regional challenge commitment offered by the Region in which the facility is located.

National Challenge Commitments

Each National Program Office may establish National Challenge Commitments for Performance Track. These challenge commitments should reflect national priorities in each media area and may be in place as early as 2006.

- When designating a challenge commitment, a Program Office shall identify no more than one category and no more than two indicators within that category. The commitment must:
 - have a minimum quantitative target associated with it (Performance Track can provide additional guidance in setting numerical targets) and
 - be memorialized in a memorandum to OPEI from the AA of the Program Office

- All Performance Track applicants, new and renewing, can take advantage of any applicable national challenge commitments.

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